

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, *et al.*, individually and on  
behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., *et al.*,

Defendants.

Case No. 1:23-cv-08292-SHS (OTW)

Case No. 1:23-cv-10211-SHS (OTW)

**PLAINTIFFS' MOTION TO SEAL**

JONATHAN ALTER, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., *et al.*,

Defendants.

Under paragraph 25 of the Stipulated Protective Order in this case (Dkt. 338), Plaintiffs' in the *Authors Guild* and *Alter* actions ("Plaintiffs") respectfully seek to provisionally file under seal portions of their motion for leave to amend the complaint. Plaintiffs seek to file portions of this motion under seal because portions of the motion and exhibits to the motion include and discuss documents that Defendants have designated as Protected Discovery Material under the Protective Order. Dkt. 338 ¶ 25. Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. *Id.* Plaintiffs will review Defendants' filings, and if necessary, confer about any disagreement.

Dated: April 11, 2025

/s/ Rachel Geman

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***Interim Class Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify this 11 day of April 2025, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Rachel Geman

Rachel Geman